

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**JOINDER OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR
PUERTO RICO, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE, TO THE
OBJECTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
MOTION OF AD HOC GROUP OF GENERAL OBLIGATION BONDHOLDERS,
UNDER BANKRUPTCY CODE SECTIONS 105(A) AND 502 AND
BANKRUPTCY RULE 3007, ESTABLISHING PROCEDURES WITH RESPECT TO
OMNIBUS CONDITIONAL OBJECTION TO CLAIMS FILED OR ASSERTED
BY THE PUBLIC BUILDINGS AUTHORITY, HOLDERS OF
PUBLIC BUILDINGS AUTHORITY BONDS, AND HOLDERS OF
CERTAIN COMMONWEALTH GENERAL OBLIGATION BONDS**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), acting through its Special Claims Committee, (the “Special Claims Committee”) hereby submits this joinder to the *Objection of Official Committee Of Unsecured Creditors to Motion of Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and*

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds, ECF No. 6261 (the “Objection”).

1. On April 2, 2019, the Ad Hoc Group of General Obligation Bondholders (the “Ad Hoc Bondholders”) filed the *Motion of Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds*, ECF No. 6104 (the “Motion”).

2. On April 11, 2019 and April 15, 2019, the Lawful Constitutional Debt Coalition and the National Public Finance Guarantee Corporation each filed objections to the Motion. ECF Nos. 6181 and 6263

3. On April 15 2019, the Official Committee of Unsecured Creditors filed the Objection to the Motion.

4. The Special Claims Committee hereby joins in the Committee’s Objection for the reasons set forth therein.

WHEREFORE, the Special Claims Committee respectfully requests that the Court enter an order granting the Motion and such other relief as may be just.

Dated: April 19, 2019

/s/ Edward S. Weisfelner

BROWN RUDNICK LLP

Edward S. Weisfelner, Esq. (*Pro Hac Vice*)
Angela M. Papalaskaris, Esq. (*Pro Hac Vice*)
Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
eweisfelner@brownrudnick.com
apapalaskaris@brownrudnick.com

Stephen A. Best, Esq. (*Pro Hac Vice*)
601 Thirteenth Street NW, Suite 600
Washington, D.C. 20005
sbest@brownrudnick.com

Sunni P. Beville, Esq. (*Pro Hac Vice*)
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
sbeville@brownrudnick.com

*Counsel to the Financial Oversight and Management
Board, acting through the Special Claims Committee*

and

/s/ Kenneth C. Suria

ESTRELLA, LLC

Alberto Estrella (USDC-PR 209804)
Kenneth C. Suria (USDC-PR 213302)
P. O. Box 9023596
San Juan, Puerto Rico 00902-3596
Tel.: (787) 977-5050
Fax: (787) 977-5090

*Local Counsel to the Financial Oversight and Management
Board, acting through the Special Claims Committee*